

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 1:21-mj-04074-DHH
)
 ANDREW MAHN)

[assented-to]
DEFENDANT'S MOTION TO MODIFY RELEASE CONDITION
[Permission to Travel Out of District]

Defendant Andrew Mahn, by his counsel, respectfully moves to modify the conditions of his pretrial release to permit him to travel roundtrip from his home state of New Hampshire to Michigan from April 5 – 10, 2021.

Specifically, defendant seeks permission to accompany his fiancée to travel to Michigan in order to visit her parents, who reside in New Boston, MI. While en route, they intend to visit a mutual friend in Camillus, New York. Specific travel details and contact information have been provided to United States Probation Officer Karin Hess and to the government.

The United States Probation Office, by Probation Officer Karin Hess, and the United States Attorney's Office, by Assistant United States Attorney Charles Dell'Anno, District of Massachusetts, both assent to this motion.¹

Accordingly, defendant seeks approval for this modification.

Allowed. All other conditions of defendant's release
Remain in full force and effect.



ANDREW MAHN
By his attorney,

/s/ Julie-Ann Olson
Julie-Ann Olson, B.B.O. #661464
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
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¹ AUSA Dell'Anno has conferred with his counterpart in the Northern District of Illinois assigned to this case, who does not object to this request.

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 30, 2021.

/s/ Julie-Ann Olson

Julie-Ann Olson